

201-14328



NCIC HPV

Sent by: Mary-Beth  
Weaver

03/05/2003 02:10 PM

To: NCIC HPV, Jodi Burgess/DC/USEPA/US@EPA

cc:

cc:

Subject: Public comments on the HPV test plan for silane, dichlorodimethyl  
reaction products with silica



Jessica Sandler <jessicas@peta.org> on 03/04/2003 01:22:00 PM

To: oppt.ncic@epamail.epa.gov, hvp.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen  
Boswell/DC/USEPA/US@EPA, Stewart\_Miller@cabot-corp.com

cc:

Subject: Public comments on the HPV test plan for silane, dichlorodimethyl reaction products with silica

Attached please find the comments of the U.S. animal protection community on the HPV test  
plan for silane, dichlorodimethyl reaction products with silica.

Jessica Sandler, MHS  
Federal Agency Liaison  
People for the Ethical Treatment of Animals  
757-622-7382 ext. 1304  
jessicas@peta.org



[www.peta.org](http://www.peta.org) HPV test plan comments -- Silica surface products.pdf

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March 4, 2003

Christine Todd Whitman, Administrator  
US Environmental Protection Agency  
Ariel Rios Bldg., Rm. 3000 (1101A)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

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PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS

501 FRONT STREET  
NORFOLK, VA 23510  
TEL 757-622-PETA  
FAX 757-622-0457

Re: Comments on the HPV test plan and robust summary for silane,  
dichlorodimethyl reaction products with silica, prepared by a consortium  
composed of Cabot Corp., Degussa AG and Wacker-Chemie GmbH

Dear Administrator Whitman:

The following comments are on the test plan for silane, dichlorodimethyl reaction products with silica, prepared by a consortium composed of Cabot Corp., Degussa AG and Wacker-Chemie GmbH (referred to below as the Consortium). These comments are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the US, the Doris Day Animal League, and Earth Island Institute. These animal, health, and environmental organizations have a combined membership of more than ten million Americans.

The Consortium's test plan presents a great deal of data from previous studies carried out by Consortium members and other bodies, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume (HPV) Chemical Challenge. We consider it worth noting that the Consortium has decided not to carry out further inhalation toxicity tests, because less than 1% of the commercially available material is respirable. This position is to be commended, and demonstrates the Consortium's appreciation of the October 1999 Agreement among the EPA, industry, and health, environmental and animal-protection organizations, which contains the following statement:

1. In analyzing the adequacy of existing data, participants shall conduct a thoughtful, qualitative analysis rather than use a rote checklist approach. Participants may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested.

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at [JessicaS@PETA.org](mailto:JessicaS@PETA.org).

Yours sincerely,

Jessica Sandler, MHS  
Federal Agency Liaison  
PETA

Richard Thornhill, PhD  
Research Associate  
PETA Research and Education Foundation

AN INTERNATIONAL  
ORGANIZATION DEDICATED  
TO PROTECTING  
THE RIGHTS OF ALL ANIMALS